



ConsultationResponse

FROM THE RSPCA IN WALES

Consultation response: Increasing recycling by businesses November 2019

RSPCA Cymru welcomes the opportunity to engage with this consultation on the proposed statutory instruments for increasing business recycling in Wales.

We have long campaigned on the need for increased recycling in Wales, noting the harmful impact that waste items can have on animals, notably wildlife and livestock, and have recently launched a consultation on the Animal Welfare Charter, a new guide by the RSPCA for businesses and other organisations to improve animal welfare in Wales via a number of means, including increased and better recycling.¹

Litter and a lack of recycling can have a profound impact on animals and their welfare. Annually, across England and Wales, we receive around 5,000 calls regarding animals impacted by litter - and, clearly, more efficient recycling rates could play a leading role in reducing this threat to animals. We continue to issue advice to members of the public about the risk of litter to animals - including the importance of reusing materials, recycling and adequately preparing waste for recycling.

We would welcome the benefits to animals and their welfare of improved recycling rates and reduced littering being referenced in Welsh Government documentation on this subject - particularly given the prevalence of calls received by the RSPCA on this matter each year.

QUESTION 1: DO YOU AGREE THAT THE LEVEL OF SEGREGATION ASKED OF BUSINESSES IS ACCEPTABLE? IF NO, PLEASE STATE WHY AND AN ALTERNATIVE.

QUESTION 2: DO YOU AGREE WITH THE MATERIALS THAT ARE PROPOSED? IF NOT, PLEASE STATE WHY.

RSPCA Cymru continues to encourage recycling and reuse of materials to help the environment; and mitigate risks to animals of littering and waste.

That is our primary focus - and any system of segregation that is achievable for businesses; and increases recycling rates, reduces littering or unnecessary disposal and raises awareness as to the impact not disposing of materials correctly can have on animals is welcome.

This should be carefully balanced with what is achievable for premises; to ensure any scheme of segregation doesn't accidentally reduce recycling rates. For example, many RSPCA centres, premises and facilities in Wales rely heavily on volunteers - many of whom may now be involved in any future

¹ [RSPCA Animal Welfare Charter](#)

process of segregation. This emphasises the need for a thorough communication programme with businesses - particularly smaller organisations or those reliant on volunteers - to ensure a smooth transition to increased business waste segregation.

To this end, we acknowledge that Option 3 does not incur the possible cost and time implications of Option 4; but requires a high level of segregation that will produce higher quality materials.

Of the proposed materials listed, plastics is of particular concern to the RSPCA in Wales. Indeed, the number of animals affected by plastic litter in England and Wales is at an all-time high, with incidents increasing by 22% in just four years. In Wales, just those plastic-related incidents that were reported to the RSPCA have increased almost 29% when comparing 2015 with 2018 - rising from 21 to 27 incidents - despite the overall number of calls about litter falling.

Wales: general litter incidents (and plastic incidents in brackets)			
2015	2016	2017	2018
100 (21)	80 (27)	76 (23)	75 (27)

While materials in Option 3 appear thorough, we would welcome the Welsh Government to contextualise the need to correctly dispose of waste items, and utilise the serious threat posed to Wales' animals if not disposed of responsibly - an issue we believe is an important motivator in encouraging recycling and responsible disposal.

QUESTION 3: ARE THERE PARTICULAR SUB FRACTIONS OF THE SPECIFIED MATERIALS SHOULD BE EITHER INCLUDED OR EXCLUDED FROM THE REQUIREMENT TO KEEP SEPARATE AND SEPARATELY COLLECT (FOR EXAMPLE, CONTAMINATED PAPER). IF THERE ARE, PLEASE STATE WHY.

RSPCA Cymru believes the proposals could be enhanced and offer further benefits to the environment - and specifically to the welfare of animals - by urging businesses to carefully dispose of certain materials, for example plastic rings, certain containers, or other structures, which without being further broken down before disposal could trap and injure animals. Indeed, animals will not get caught in them or mistake them for food, both of which can have fatal implications. The RSPCA would suggest that such items are cut up before being disposed of in the relevant segregated bags - and that this process offers an opportunity to communicate this to premises as part of their waste segregation activities.

RSPCA Cymru also ask that Welsh Government consider looking at the disposal of animal waste, in addition to that of food. Many of the RSPCA animal centres, hospitals and other facilities produce large amounts of animal waste per day. Llys Nini Animal Centre in Swansea, for example, produces up to 75kg of cat litter each day. If there was provision to collect and recycle used cat litter centrally, it could be economically viable to convert it into biochar, charcoal or another commercially important material, rather than it going to landfill.

Case Study

In September 2014, the RSPCA were called to a house whereby a Cardiff boy had found a hedgehog with a McDonalds McFlurry lid stuck on its head. RSPCA Animal Collection Officer (ACO) Gary Lucas attended and cut off the lid trapping the hedgehog, before taking it to the vet for

a check-up. ACO Lucas said: "We urge people to throw away their litter responsibly. Animals like hedgehogs are attracted by leftover food in containers like bottles, pots and tins and can get trapped or injured by litter."²

QUESTION 4: DO YOU AGREE THAT LEAD IN TIMES FOR THE PROPOSALS ARE REASONABLE? IF NO, WHAT ALTERNATIVE LEAD IN TIME WOULD YOU SUGGEST?

The RSPCA welcomes these proposals and believe that they sit in line with our commitment to encouraging less waste and higher rates of recycling in Wales.

In terms of timeframe, RSPCA Cymru supports improved recycling rates as soon as is reasonably possible; while appreciating the scale of these changes. As referenced, they will have an impact on RSPCA Cymru and branch premises and - as such - any lead-in times must be accompanied via a thorough communications and awareness-raising plan.

The RSPCA has endorsed a plastic waste policy timeframe, including the phase out of pointless and problem plastic before 2020, replaceable plastic in the early 2020s and hard-to-replace plastic by 2025. As such, this would ensure single-use plastics are phased out by 2025 - and we'd welcome any lead-in times that helped achieve these aims.

As such, the issue of roll-out is an important balancing act between ensuring a further increase in recycling in Wales as we aim to become a carbon neutral and environmentally friendly nation by 2050; and ensuring organisations - including those heavily reliant on volunteers - understand and are equipped to meet the segregation requirements.

QUESTION 5: DO YOU HAVE ANY OTHER COMMENTS ON THE IMPACT OF THESE PROPOSALS (FOR EXAMPLE, IMPACTS ON YOUR ORGANISATION)?

RSPCA Cymru welcomes the Welsh Government's conclusion on the considered exception of 'de minimis based on business size.' We believe that those organisations with between 0 and 4 employees should still be held to the same recycling and waste disposal requirements as larger organisations. Fewer employees inevitably means less waste. This should, in theory, make for easier disposal of such waste, as well as its segregation. Accordingly, RSPCA Cymru recommends that the the 'De minimis based on business size' exemption is not taken forward, to ensure that the new commitment of increased recycling is as far reaching as possible and therefore has the potential to positively impact on as many as possible, including Wales' wildlife and livestock.

Indeed, the principle of our proposed Animal Welfare Charter is that organisations and individuals of all sizes can make a contribution to ensure the country is a better place for animals. Effective recycling and reducing littering is a key part of that; and applying these new requirements to all businesses will ensure the importance of segregated recycling is communicated to a wider audience.

Equally, we welcome the decision not to include an exemption for rural areas. Animal welfare impacts as a consequence of a lack of recycling, or littering, can be most acutely felt in rural areas; where more wildlife and livestock are based. As such, removal of this exemption will be potentially in the interests of animals in rural areas.

² [ITV News - 9 September 2014](#)

QUESTION 8: WE HAVE ASKED A NUMBER OF SPECIFIC QUESTIONS. IF YOU HAVE ANY RELATED ISSUES WHICH WE HAVE NOT SPECIFICALLY ADDRESSED, PLEASE USE THIS SPACE TO REPORT THEM.

As noted above, the RSPCA have recently launched a consultation on our Animal Welfare Charter, a brand new guide for businesses and other organisations to improve animal welfare across England and Wales.³

One of our key asks within the Charter is 'supporting good practice to reduce risk to animals'. This includes helping to improve the environment for animals, encouraging all individuals on premises to recycle and take action against the unnecessary creation of plastic waste by replacing plastics where possible within the organisation - emphasising the negative impacts litter in general can have for animals. In the longer term, we would envisage compliance with recycling segregation would be an essential criterion in being recognised via the proposed Charter.

The RSPCA believe that it is hugely important to understand the impact of litter on our wildlife. Between 2015 and 2018, some 331 incidents were reported to RSPCA Cymru relating to animals whose welfare has been compromised by litter.⁴ All litter, including discarded sky lanterns, helium balloons or fishing tackle, can end up hurting animals as they confuse discarded plastics and other materials for food, often resulting in choking, trapping, ensnaring or injuring animals. By reducing plastic production and consumption, and improving recycling within businesses, the number of waste-related animal incidents can be reduced.

Accordingly, the RSPCA believes that the proposals outlined in the consultation can go some way to helping us achieve our goal of protecting Wales' animals, including wildlife and livestock.

RSPCA Cymru also support the Welsh Government's conclusions on the exemptions, particularly those of 'de minimis based on business size' and an exemption for those in rural areas. It is the view of the RSPCA that increased recycling will have a largely positive impact on Wales' wildlife and as such support the proposals being as far-reaching as is possible.

³ [RSPCA Animal Welfare Charter](#)

⁴ [RSPCA Cymru Welfare Indicators](#)